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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MICHAEL D. FROELICH,

Plaintiff,

vs.

PHH MORTGAGE CORPORATION,

Defendants.

Case No.: 2:19-cv-00175-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
REPLY IN SUPPORT OF THE PHH  
MORTGAGE CORPORATION'S  
MOTION TO DISMISS COMPLAINT  
WITH PREJUDICE [ECF NO. 7]**

Plaintiff, Michael D. Froelich ("Plaintiff"), and Defendant, PHH Mortgage Corporation ("PHH"),  
by and through their respective attorneys of records, hereby agree and stipulate as follows.

1. On March 12, 2019, PHH filed its Motion to Dismiss Complaint with Prejudice [ECF No. 7] ("Motion");
2. On March 26, 2019, Plaintiff filed his Response in Opposition to the Motion [ECF No. 9] ("Response");
3. PHH's counsel is requesting an additional fourteen (14) days to file its Reply to Plaintiff's Response, and thus requests up to April 16, 2019, to file a reply;
4. This extension is requested to allow PHH's counsel to finalize her reply to the Response, as she has been ill;
5. This extension is further requested to allow counsel for Plaintiff and PHH to engage in negotiations in an effort to reach an early resolution of this matter;

6. This Stipulation is made in good faith and not for purposes of delay.

**IT IS SO STIPULATED.**

DATED this 3<sup>rd</sup> day of April, 2019.

**WRIGHT, FINLAY & ZAK, LLP**

/s/ Christina V. Miller

Christina V. Miller

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Las Vegas, Nevada 89117

*Attorneys for Defendant, PHH Mortgage Corporation*

DATED this 3<sup>rd</sup> day of April, 2019.

**HAINES & KRIEGER, LLC**

/s/ Shawn Miller

David Krieger, Esq.

Nevada Bar No. 9086

Shawn Miller, Esq.

Nevada Bar No. 7825


8985 S. Eastern Ave., #350

Henderson, Nevada 89123

*Attorneys for Plaintiff, Michael D. Froelich*

**IT IS SO ORDERED.**

Dated this 3<sup>rd</sup> day of April, 2019.



ANDREW P. GORDON

UNITED STATES DISTRICT JUDGE